

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

FILED - GR
April 24, 2025 4:16 PM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY:JJM SCANNED BY: JS / 4-25

NEVIN P. COOPER-KEEL,
Plaintiff Pro Se,

Case No. **1:25-cv-462**
Robert J. Jonker- U.S. District Judge

V.

Hon.

ALLEGAN PUBLIC SCHOOLS, (a school district
and JAMES ANTOINE and PAUL LEGGE,
Sued in their individual capacities,
Defendants.

VERIFIED COMPLAINT WITH JURY TRIAL DEMAND

Plaintiff Nevin P. Cooper-Keel, JD
5985 Verta Dr. NE
Belmont, MI 49306
616.329.7077
Nevincooperkeel@gmail.com

Defendant Allegan Public Schools
550 5th St
Allegan, MI 49010
269.673.5431

Defendant James Antoine
550 5th St
Allegan, MI 49010
269.673.5431

Defendant Paul Legge
550 5th St
Allegan, MI 49010
269.673.5431

Plaintiff, pro se, Nevin Cooper-Keel, states:

1. Defendant Allegan Public Schools is a public school district in Allegan, Michigan.
2. Defendant James Antoine is the superintendent of Allegan Public Schools.
3. Defendant Paul Legge is a teacher and girls varsity soccer coach at Allegan Public Schools.
4. I reside in Belmont, Michigan.
5. My daughter, hereafter "SC", was a student and soccer player on the girls varsity team of APS in April, 2022.

6. On or about April 24th, 2022, Defendant Legge brought the girls soccer team to a deer camp he works at in the off season of teaching.
7. On or about April 24th, 2022, Defendant Legge coerced and directed some of the girls from the soccer team to kill possums at that deer camp with their bare hands and feet.
8. SC was one of the girls he coerced and directed to do that with him.
9. After SC came home from that weekend and told me what happened, she was worried that I was going to report Defendant Legge for what went on.
10. Defendant Legge then devised with my daughter to pre-emptively discredit me with a deliberately false claim from Defendant Legge, which he put in writing, inter alia, that I am engaged in the worst child abuse he has ever seen “in 20 years of teaching”.
11. I then reported Defendant Legge to Defendant Antoine and the APS School Board.
12. Upon initially hearing my complaint about Defendant Legge, Defendant Antoine refused to investigate, saying that it was beneath him and that I am just “an irate parent”.
13. Upon info and belief, Defendant Legge continued to teach at APS up to present.
14. Defendant Antoine then notified me that I would be trespassing if I were to so much as go to any APS grounds.
15. Defendant Antoine’s real reason for that was to prevent me from attending school board meetings and questioning their handling of this in public.

16. Defendant Legge filed a deliberately false complaint to CPS and wrote a letter in conspiracy with SC's non-custodial mother, claiming inter alia, that I'm feeding SC too much steak and that she needs a 'higher energy diet'.

17. The coercion to torture animals to death was a hazing ritual in violation of MCL 750.411t.

Count 1 – Deprivation of Rights under Color of Law, 1983

18. Defendants violated my first amendment rights by sending me a no trespassing letter to prevent me from attending school board meetings or other public events.

19. Defendants violated my due process rights by refusing to investigate a crime committed by a teacher at their school.

Count 2 – Gross Negligence

20. Defendants conduct was grossly negligent.

21. Defendants grossly negligent conduct was proximately the cause of my injuries, injuries including but not limited to violation of my first amendment right to free speech, due process, etc.

Damages

22. Damages are substantial and in an amount to be proven at trial in compensatory and punitive damages.

Prayer for Relief

23. I request a declaratory judgment that a public school district cannot trespass a person from their property in retaliation to their protected speech.

24. Award monetary damages as determined at trial.

Respectfully Submitted,



Nevin Cooper-Keel, Plaintiff pro se, 4.24.25